

## DISCOVERY PLAN WORKSHEET

### Phase I (Pre-Settlement Discovery)

**Deadline for completion of Rule 26(a) initial disclosures and HIPAA-compliant records authorizations:**

1/21/2020

**Completion date for Phase I Discovery as agreed upon by the parties:**  
*(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)*

3/6/2020

**Date for initial settlement conference:**

*(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)*

3/17/2020

### Phase II (Discovery and Motion Practice)

**Motion to join new parties or amend the pleadings:**

*(Presumptively 15 days post initial settlement conference)*

4/1/2020

**First requests for production of documents and for interrogatories due by:**

*(Presumptively 15 days post joining/amending)*

4/16/2020

**All fact discovery completed by:**

*(Presumptively 3.5 months post first requests for documents/interrogatories)*

8/3/2020

**Exchange of expert reports completed by:**

*(Presumptively 30 days post fact discovery)*

9/2/2020

**Expert depositions completed by:**

*(Presumptively 30 days post expert reports)*

10/2/2020

**COMPLETION OF ALL DISCOVERY BY:**

*(Presumptively 9 months after Initial Conference)*

**SEPTEMBER 19, 2020**

10/9/2020

**Final date to take first step in dispositive motion practice:**

*(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)*

11/9/2020

**Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?**

Yes